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July 11, 2008

**VIA ELECTRONIC FILING**

Honorable Gregory M. Sleet  
U.S. District Court for the  
District of Delaware  
844 North King Street  
Lock Box 18  
Wilmington, DE 19801

**Re: *Davis International, LLC v. New Start Group Corp., et al.***  
**C.A. No. 04-cv-1482 (GMS)**

Dear Chief Judge Sleet:

We write on behalf of defendant Oleg Deripaska in response to the July 7, 2008 letter sent to the Court on behalf of plaintiffs. Plaintiffs request a “stay of the Court’s decision on the pending anti-suit motion until the Davis Plaintiffs have had time to study the decision and formulate their position on the impact of this decision on the pending litigation.”

The motion pending before the Court for decision was brought by the ten defendants in this case, as to whom all plaintiffs’ claims have been dismissed and affirmed on appeal. The English Court decision attached to counsel’s letter is from an unrelated dispute between only two of the ten defendants. Plaintiffs do not say, and cannot say, that this decision mentions the plaintiffs in this action or the subject of the pending motion – which is plaintiffs’ U.S. litigation misconduct. Indeed, plaintiffs do not say, and cannot say, that the decision mentions the subject of plaintiffs’ dismissed claims in this action – the Russian company known by the acronym GOK, or the vanadium industry in which it is said to be engaged. Eight of the ten moving defendants are not parties to the English proceedings.

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If the Court believes it would be helpful for defendants to address plaintiffs' letter in detail, and the many inaccuracies contained in the letter, we will do so in a manner and on a schedule that the Court deems appropriate.

Respectfully,

  
Collins J. Seltz, Jr.

CJS,Jr./jtf

cc: Clerk of the Court (via CM/ECF)  
David L. Finger, Esq. (via CM/ECF)  
Richard I. G. Jones, Esq. (via CM/ECF)  
William M. Lafferty, Esq. (via CM/ECF)  
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